

### **Remarks/Arguments**

Claims 1-33 were pending in the application. Claims 1-18 have been canceled and so claims 19-33 remain pending. Of these claims, claims 19, 24, and 29 have been amended and are fully supported by the specification. Applicants have amended the claims to clarify the claim language. No new matter has been added to the prosecution of this application. For at least the reasons stated below, Applicants assert that all claims are now in condition for allowance.

#### **1. 35 U.S.C. §§ 112 and 132 Rejections**

The Examiner has rejected the amendments from Applicants' prior response because the amendments do not appear to be supported by the original specification. In particular, the Examiner asks Applicants to point out support in the specification for "a multi-tier client/server architecture receiving 'user-selected keywords' wherein data contained within said user input data files is organized around the keywords."

In response, Applicants respectfully direct the Examiner's attention to figures 2 and 7 as well as pages 23-29 of the specification. Starting on page 9, the Brief Description of Drawings section states that "Figure 3 is a flowchart depicting a process for providing a multi-tier client/server architecture for storing files and/or records" and "Figure 7 is a flowchart illustrating a process for loading data in a multi-tier client/server architecture." Starting on page 23 is the portion of the specification explaining the Data Load process. Here, the specification states that the "load process can be used to allow a user to: create logical sets of data organized around '**keywords**' ". On the following page (page 24, line 18), the specification explains that in one embodiment of the invention, "the **keywords** are organized into a **tier structure**, where all keywords within one tier must be loaded before the next tier can be started." For example, an "illustrative data load process may be embodied in a **three tier client/server architecture**" (page 24, lines 23-24).

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Referring to figure 2, "shown at arrow 2, the **user selects specific keywords within a tier** 204 to load into the database 206." Then on page 29 (starting at line 7), the specification states that figure "7 is a flowchart illustrating a process 700 for **loading data in a multi-tier client/server architecture**. In operation 702, a plurality of **user-selected keywords** are received. **Data is organized around the keywords**. The data can include medical-related data such as medical records. A data management template which corresponds to the keywords is selected in operation 704. A validation is performed in operation 706 to determine whether all of the data to be loaded matches the data management template. The data is sent to a database in operation 708 to be loaded in the database upon validation that the data matches the data management template."

As the previous amendments to the specification do not introduce new matter, Applicants respectfully request that the rejections under 35 U.S.C. §§ 112 and 132 be withdrawn.

## **2. 35 U.S.C. § 103 Rejections**

Claims 1-18 have been canceled and so their § 103 rejections are not discussed.

Claims 19, 21, 24, 26, 29 and 31 were rejected under 35 U.S.C. § 103 as being unpatentable over Buchanan (US Patent 5,267,155) in view of Edwards (US Patent 5,410,551) and in further view of Hobbs (US Patent 6,523,022). Applicants respectfully oppose these rejections.

As amended, claim 19 is directed to generating error and summary reports for a data load, while storing user input data files in a multi-tier client/server architecture, comprising the steps of:

- (a) maintaining a connection between multiple user stations and a server having a database;
- (b) receiving from one of the user stations a plurality of user input data files;

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- (c) receiving a plurality of user-selected keywords, wherein data contained within said user input data files is organized around the keywords;
- (d) selecting a data management template corresponding to the keywords;
- (e) validating that all data to be loaded into the database match the data management template by enforcing business rules/requirements and ensuring that referential integrity, codependency, primary key, required field, default field, sequence number, and hard-coded field checks are met;
- (f) loading the validated data into the database; and,
- (g) compiling a report identifying data that match the data management template and data that do not match the data management template.

In their previous response, Applicants argued that the teaching in Edwards is of little value to a data base software programmer, since Edwards discloses a validation process involving only the comparison of two simple lists of numerical data [Edwards Fig. 1A, items 160, 170. Also col. 26 lines 60-68] while Applicants' invention validates data "by enforcing business rules/requirements and ensuring that referential integrity, codependency, primary key, required field, default field, sequence number, and hard-coded field checks are met." In his Response, the Examiner stated that such limitations were in the specification but were not found in the claims themselves. The independent claims are now amended to include these validation limitations, which are not found or suggested in any of the cited prior art, and which cause Edwards to be non-analogous art.

The Examiner agrees that Buchanan and Edwards fail to teach (among other things) "receiving a plurality of user-selected keywords, wherein data contained within said user input data files is organized around the keywords." The Examiner looks to Hobbs for a

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teaching of such a plurality of user-selected keywords around which the data files are organized. Specifically, the Examiner states "record retrieval from a database based on embedded expert judgments linked to words, phrases, sentences and paragraphs of text entered by the user" reads on this keyword limitation. Applicants respectfully believe that a deeper reading of Hobbs reveals this assertion to be false.

In general terms, the present invention requires a set of user-selected keywords and a set of input data files, where the data files are organized around the keywords, and where they are validated against a template in order to be loaded into a database. Hobbs does not teach or suggest this. Hobbs uses the terms "Links" and "Linked terms" to refer to the words, phrases, sentences and the like for which the Examiner believes are analogous to the keywords in the claims. Figure 5 is a flowchart showing how a user operates the Hobbs invention. Such operation is described in column 17 starting at line 17. Box 249 of the figure shows a document that is already stored on the system and is presented to the user as a webpage. This document has a linked term ("automotive-related industry"). When the user clicks on this hyperlink, the embedded HTML command is sent to a server to retrieve documents associated with this link and to display them in a series of frames (boxes 262, 263, 264 and 265).

Thus, the Hobbs invention displays to the user web documents that are already stored on the web server. This does not teach receiving from the user "a plurality of user input data files". Hobb's web documents that are already stored on the web server having embedded hyperlinks do not teach receiving "user-selected keywords" from the user where the input data files supplied by the user are "organized around the keywords."

Because the cited references (alone or in combination) fail to teach the amended limitations in the claims, and because Hobbs fails to teach or suggest receiving from a user a plurality of user input data files and receiving user-selected keywords around which the user supplied data files are organized, Applicants respectfully request that the Examiner's

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§103 rejections be withdrawn for claim 19. Furthermore, as the remaining claims 20-33 are dependent upon claim 19 or are system and computer program claims corresponding to claim 19, Applicants request that the §103 rejections for claims 20-33 also be withdrawn.

### **3. Conclusion**

Applicants submit that all pending claims are allowable over the art of record and respectfully requests that a Notice of Allowance be issued in this case. In the event a telephone conversation would expedite the prosecution of this application, the Examiner may reach the undersigned at 612-607-7508. If any fees are due in connection with the filing of this paper, then the Commissioner is authorized to charge such fees including fees for any extension of time, to Deposit Account No. 50-1901 (Docket 060021-340501).

Respectfully submitted,



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